

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

BRENDA RAY,

DEBTOR.

JAMES W. CUNNINGHAM, TRUSTEE,

PLAINTIFF,

v

AESTHETIC ARTS, LLC,

DEFENDANT.

CHAPTER 7

CASE No. 19-30927-HDH-7

ADVERSARY No. 20-03018

JURY TRIAL DEMANDED

**ANSWER OF AESTHETIC ARTS, LLC TO PLAINTIFF'S AMENDED COMPLAINT
AND DEMAND FOR JURY TRIAL**

Aesthetic Arts, LLC ("Defendant"), files this *Answer* and *Demand for Jury Trial* in response to the *First Amended Complaint to Avoid Prepetition Transfer and/or Postpetition Transfer and for Return of Property or its Value* (ECF Docket No. 9, "Complaint") filed by James W. Cunningham, Chapter 7 Trustee ("Plaintiff"), and demands a jury trial of all claims and defenses arising in this proceeding, and in support thereof would respectfully show as follows:

DENIALS AND ADMISSIONS

1. Paragraph 1 of the *Complaint* is admitted.
2. Paragraph 2 of the *Complaint* consist entirely of conclusions of law to which no response is required.
3. Paragraph 3 of the *Complaint* is admitted.

4. Paragraph 4 of the *Complaint* is admitted.
5. Paragraph 5 of the *Complaint* is admitted.
6. Paragraph 6 of the *Complaint* is admitted.
7. Paragraph 7 of the *Complaint* is denied as stated.
8. Paragraph 8 of the *Complaint* is denied.
9. In response to Paragraph 9 of the *Complaint*, Defendant admits that it has paid \$15,000.00 to Plaintiff.
10. Paragraph 10 of the *Complaint* is denied.
11. Paragraph 11 of the *Complaint* is denied.
12. Paragraph 12 of the *Complaint* is denied.

DEMAND FOR JURY TRIAL

Defendant hereby demands a jury trial of all factual issues arising in this proceeding.

WHEREFORE, Defendant respectfully prays that this Court enter a judgment in favor of the Defendant and against the Plaintiff that the Plaintiff take nothing by way of such claims, awarding the Defendant its costs and reasonable attorney's fees, and granting Defendant such further relief as to which it may be entitled.

Dated: July 14, 2020

/s/ John P. Lewis, Jr.

John P. Lewis, Jr.

Texas State Bar No. 12294400

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Attorneys for Aesthetic Arts, LLC, Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2020, a true and correct copy of the foregoing *Defendant's Answer to Plaintiff's Amended Complaint* was served by email attachment and electronic transmission through the Court's ECF noticing system on system on Daniel J. Sherman, Esq., Sherman & Yaquinto, 509 N. Montclair Ave., Dallas, Texas 75208, Attorneys for Plaintiff, James W. Cunningham, Chapter 7 Trustee.

/s/ John P. Lewis, Jr.
John P. Lewis, Jr.